

COLLABORATIVE SOLUTIONS, INC.

Moderator: Valencia Moss
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OPERATOR: This is Conference #: 405788113.

SLIDE 1

Hello, everyone and thank you for joining us for the HOPWA/COVID-19: A Review of Current Questions and Answers for HOPWA Grantees and Sponsors. Today's webinar is being recorded and will be available for on-demand viewing immediately following today's webinar.

If you would like to download a copy of today's PowerPoint presentation, you may do so by locating the links box located in the left-hand corner of your screen. Select number 1, HOPWA Program COVID Update and hit Open. This document will download directly to your desktop.

Also, if you have questions and would like to chat with today's presenters, we ask you to utilize the chat box located in the left-hand corner of your screen. Calling in to today's webinar is not available due to the call volume. We ask that you please give your attention to the program, and I would like to introduce you to your first speaker Kate Briddell. Kate?

Kate Briddell: Thank you, Valencia. Hello, everyone. We're glad you could be here. Collaborative Solutions is pleased to present this webinar titled COVID-19 – HOPWA COVID-19, A Review of Current Questions and Answers for HOPWA Grantees and Sponsors.

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Today's speakers are myself, Kate Briddell, and Crystal Pope with Collaborative Solutions. Also on the line are Rita Harcrow, the Director of the Office of HIV/AIDS Housing, Ben Ayers, the Deputy Director at OHH, and Amy Palilonis, the Senior Program Specialist at OHH. Monitoring the chat box are Christine Campbell and Emily Fischbein with Collaborative Solutions.

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Today's webinar objectives are to review the frequently asked questions from HOPWA grantees and sponsors in response to COVID-19 related waivers in the CARES Act. Also to provide some additional guidance on how to operationalize waiver and CARES Act provisions, identify where webinar participants can go for additional information and assistance, and hopefully answer some questions. We have a lot of content for you today, so we may not have time to answer many questions during the webinar. However, as Valencia indicated, please put your chat box questions in the chat box because this also helps us to know what kinds of questions grantees and sponsors have or are struggling with.

We will incorporate answers to these questions in future webinars or postings as much as we can. Also, should you have any questions after this webinar, please put your questions to the Ask A Question Help Desk. This is also not going to be the last webinar on this topic. The next one is tentatively scheduled for May 6 at 2:00 p.m. Eastern Time.

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So let's jump right in. We want to talk about mega-waiver and CARES Act provisions.

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As you know, on April 1st, there was a mega-waiver that was announced through a memorandum that talked about Continuum of Care, ESG, HOPWA and Consolidated Planning requirements to help to prevent the spread of

COVID-19 and provide additional supports to families and individuals who are eligible for those programs.

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So what HOPWA regulations are waived through this memorandum? Well first, the HOPWA self-certification of income and creditable income on HIV status. Second is the HOPWA rent standard for TBRA. Third are property standards for TBRA. And the fourth is the space and security section.

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For those waivers that are particular to the Con Plan, what's waived is the citizen participation public comment period for Con Plan amendment, which reduces the 30-day comment period to a period of not less than five days. And also the citizen participation, reasonable notice and opportunity to comment. The grantee should determine and document what constitutes reasonable notice.

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So another question is "I've notified my field office's CPD director of my jurisdiction's decision to use all of the available waivers. Is there anything else I should do related to the waiver?" And the answer is yes. First, a reminder that you need to wait two days from the date of notification before you implement any of the new flexibility. Second, we suggest that you establish a written set of emergency policies and procedures related to the COVID-19 pandemic. These policies should outline: one, the waivers that you're using; two, how you're implementing those waivers; and three, the records you will maintain to support the waivers.

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Let's go on to the CARES Act Provisions.

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As you know, the CARES Act provides \$65 million in supplemental funding for HOPWA. You should all have received notice of your supplemental award. And there is a link in the resources slides at the end that links you to that information. \$53.7 million was given to formula grantees, \$10 million in

a one time non-renewable funding for competitive grantees, and \$1.3 million to TA providers.

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Another provision of the CARES Act that we haven't spent a lot of time talking about in earlier webinars is the eviction moratorium that's in the CARES Act. The CARES Act contains a moratorium on evictions for assisted households. Assisted households cannot be evicted for 120 days from March 27th, the date the CARES Act was signed into law, through July 25th, 2020. That moratorium only applies to HOPWA assisted households that receive ongoing rental assistance in tenant or project-based rental assistance, transitional housing, and short-term rent – and short-term rental assistance under STRMU.

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Households that only receive utility and mortgage assistance under STRMU are not covered by the CARES Act moratorium on eviction. During the 120 day moratorium, the landlord cannot require a protected client to vacate a unit, they cannot issue a notice to vacate to a protected client, and they cannot file to evict or cause an eviction to be filed for non-payment of rent or other fees and charges for a protected client. The moratorium only applies to non-payment of rent or charges. Landlords can still undertake an eviction for violation of other lease terms.

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After the 120 days, landlords cannot require a tenant to vacate without first providing a notice to vacate at least 30 days in advance. So general use of CARES Act fund are used to maintain operations for rental assistance, supportive services and other necessary actions in order to prevent, prepare for, and respond to COVID-19. Funds may be used to provide eligible HOPWA activities identified in 24 CFR Part 574 in a manner that addresses the needs of each grantee community related to COVID-19 preparedness and response.

CARES Act funds may also be used to self-isolate, quarantine or provide other coronavirus infection control services as recommended by the CDC for

household members not living with HIV. CARES Act funds may be used to cover or reimburse allowable costs incurred by a grantee or project sponsor for allowable activities, regardless of the date on which such costs were incurred. CARES Act funds may be – I'm sorry – IDIS guidance will be provided on how to accommodate retroactive reimbursement and how to track the approximate cost dates.

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So, again, a question that we've gotten is how does HUD expect the CARES Act funds to be used? Well, CARES Act funds are to be used as additional funding, and they can be used for any eligible HOPWA activities. They need to be used to help communities with their needs related to COVID-19 preparedness and response. And again, to be used for self-isolation quarantine, or provide other COVID-19 infection controls for household members who are not living with HIV.

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Specific COVID-19 related activities covered by the CARES Act include hotels/ motels for either HOPWA eligible, individuals or family members as I've stated; providing transportation services, including costs for privately owned vehicle transportation to access medical care, supplies and food, or to commute to places of employment; assisting households in accessing essential services and supplies such as food, water, medications, medical care, and information; providing nutrition services in the form of food banks, groceries and meal delivery; educating households on way to reduce the risk of getting sick or spreading infectious diseases, such as COVID-19 to others; and costs related to infection control measures such as cleaning and disinfectant supplies, gloves and other safety-related supplies for staff and assisted households.

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Remember, grant funds provided under the CARES Act may be used to cover or reimburse allowable costs by a grantee or project sponsor for allowable activities to prevent, prepare for, and respond to the COVID-19 pandemic, regardless of the date on which such costs were incurred.

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Another thing this Act does is it increases the cap on administrative expenses for both grantees and project sponsors. A grantee may use up to 6 percent of CARES Act funding for administrative purposes, and the project sponsor may use up to 10 percent of its CARES Act sub-award for administrative purposes.

Please note, these admin costs limits are only applicable to the supplemental grant funds provided under the act. All other HOPWA limits admin expenses – I'm sorry – all other HOPWA awards limit the admin expenses to 3 percent of the grant for grantees and 7 percent for the project sponsors.

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So what are the next steps for all the grantees? Well, the first thing we need you to do is develop planning and budget documents for your funds. The requirements are on the next couple of slides. And all grantees, competitive and formula, must find a new grant agreement with HUD in order to accept the CARES Act funding.

Each field office will inform their respective grantees of the process for executing the grant agreements. Grantees are expected to execute new or amend existing project sponsor agreements for the supplemental funds within 14 days of execution of the formula or competitive grant agreements. The selection of project sponsors under the HOPWA program is not subject to procurement requirements of 2 CFR Part 200 Subpart D.

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Planning and budgeting. Now is the time to be thinking about the ways in which your community can best use these supplemental funds. The CARES Act funding is intended to be flexible to help you respond to the needs in your community, and you will need to determine both immediate needs and anticipated needs when planning for your CARES Act funding.

To begin your planning, consider the emerging needs of your current clients and anticipate that more needs will emerge from people living with HIV and AIDS who are not currently requiring your services. Determine what is already available from other resources in your community, such as food

banks, or Ryan White services. Consider new resources that are available within your communities like FEMA, or other HUD programs, or other local COVID response sources.

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You will need this information in your planning and budgeting to fill in the budget forms required to execute your grant agreements. Please remember as you're thinking about your planning and budgeting that this is a one-time award and must be directly related to the COVID-19 crisis. Grantees should carefully consider any type of permanent housing like TBRA that would require ongoing funding to support.

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Now let's talk about the specific steps needed for formula grantees. In order to use the CARES Act funding, you must amend your Annual Action Plan. And you may have to amend your Con Plan to accommodate the new funds in your community.

Sorry, there will be attachments that are required, but that will be the SF-424, the SF-424D, the certification at that reference there - I'm not going to read you all that stuff. Number two, new 2020 projects must be created solely for HOPWA CARES Act funding, even if you're amending 2019 Action Plan. Three, project descriptions should include budget and proposed household count by eligible activities.

The project textbox fields are where the details of the budget for the formula grantees will have to be added. Four, if you are planning to add new activities with your CARES Act funding, you must do so during this amendment process. Five, if you're planning to exercise any waivers listed in the memorandum issued April 1st, including the Con Plan waivers, you must inform your field offices' CPD directors per the instructions in the memorandum. And when you do that, you need to wait two days to put that into place.

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So if you have notified the field office that you are using the Con Plan waivers, then you will need to wait – I'm sorry, if you have notified the field

office that you were planning to use the Con Plan waiver, you need to next determine, document, and follow what you've come up with as reasonable notice to the public about the substantial amendment to your Con Plan. And then eight, begin the not less than five-day comment period, respond to any public comments, and submit your plan for approval.

The Con Plan amendment process must be completed before the CARES Act grant agreement is executed. And the CARES Act grant period of performance starts on the day the grant agreement is executed and extends for three years.

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Here's some new guidance that we wanted to make sure that you were aware of- it's currently under development. HUD is finalizing this guidance, but we wanted to provide you with the current expectations will be. HUD will be publishing IDIS guidance with any updated final changes to this information.

So for next steps for grantees for IDIS, all HOPWA formula and competitive grantees must set up new 2020 projects and activities to use solely for HOPWA CARES Act funding. The project and activity name should include COVID-19 and follow the naming convention tool. Formula grantees must create stand-alone 2020 projects and then add them to the AP-35 screen. The year of the project must match the year of the funding.

Grantees should add information on funding and household count by eligible activity for the following text fields on the Project Setup screen to estimate the number and type of families that will benefit from the proposed activities and the planned activities. Stay tuned - more guidance is coming.

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So here's the question I know that's on everyone's mind. When can we expect to receive our COVID-19 grant funds? Will the grant agreement come to our offices directly in paper form or in some other way? With our office working remotely, we want to make sure we do not miss notifications.

The grantees will receive additional information soon on the process to accept the grant funds and execute grant agreements. Exact timing cannot be

committed but HUD is working diligently to get grant agreements and instructions prepared. Information will be sent both electronically and via postal service to the grantee contact on record.

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Here's a question about competitive grantees. I represent a HOPWA competitive grantee and I want to know what should be in the "brief description of planned uses" document I send to the field. Well prior to executing a grant agreement, each HOPWA competitive grantee is expected to submit to their respective field office a brief description of planned activities for supplemental grant funds. It should be one to two pages long and list the type and amount of each eligible activity you anticipate undertaking with the funding; a description of the process that will take place to carry out the work quickly, and a description of how eligible households will access the assistance during any period of time the grantee's main operations are closed due to public health official guidance.

Each grantee must also include a completed HOPWA budget form, HUD 40 – 40110-B, and the completed forms SF-424 and SF-424D in its submission. Grantees are also encouraged to provide a description of any identified immediate technical assistance needs.

And with that, I'm going to turn it over to Crystal to talk to you about communication.

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Crystal Pope: Great, thank you.

Christine, did you have any questions in the meantime that for clarification on the things that Kate, or that Kate has covered?

Christine Campbell: Yes, we've gotten a couple of questions around whether or not you can take on new clients, the - new households with CARES Act funding, or do they need to be current HOPWA eligible – current HOPWA eligible clients that you're currently serving?

Kate Briddell: I'm sorry, can you repeat that question?

Christine Campbell: Sorry. Can you hear me?

Crystal Pope: Yes.

Christine Campbell: Can you hear me? OK. So the question basically is, can you serve new HOPWA eligible households with CARES funding or do the households need to be currently being served under HOPWA, just needing additional service due to COVID?

Crystal Pope: No, you can definitely, you can definitely serve additional households, anyone who is HOPWA eligible, with either STRMU funding.

Ben Ayers: And then just to follow up on that as well for the TBRA though, you do want to plan that out and be careful because the, you know, the COVID money is one-time only funding only. So you'll want to make sure you still have the resources available to carry those households once that funding is over. So ...

Christine Campbell: OK. And another question in that vein is, can we use CARES Act funding towards costs for HOPWA eligible clients that are outside of this program, or like they're enrolled in one of the other programs?

Rita Harcrow: So this is Rita. That was the intent. So we understand that there might be people who are permanently have through either HOPWA TBRA or in, you know, public housing or through other HUD assistance, and they would still be eligible to receive services through CARES Act, which is normally not allowed because of the duplication. But for safety, isolation, infection control kinds of measures, it would be allowed in this circumstance.

Christine Campbell: Emily, did you see anything else?

Emily Fischbein: Do we have time for one more, Crystal?

Crystal Pope: Just one more.

Emily Fischbein: OK. We did have a question about evictions, and whether a client who's in transitional housing could be evicted due to a severe housing violation.

Kate Briddell: The moratorium language in the CARES Act restricts clients, I mean, landlords from evicting clients for non-payment - they are still allowed to evict clients, not that you want them to, but they still have the ability to evict clients for violation of other lease terms. Is that correct, folks at OHH?

Ben Ayers: That is correct.

Kate Briddell: OK.

Crystal Pope: OK. Thank you, ladies.

Let's just move on. We did want to talk a little bit before we get to some of the specific questions, about a reminder on communication and how important that's going to be for your clients, for landlords and the community overall, to really be able to communicate with folks about what's going on. Clients really need information on COVID-19 and how they can stay safe, explaining why and how you're changing the way you're going to interact with them, the way you're going to do case management with them, how you've worked with them during this time, as people are moving to using remote methods.

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And we want to make sure that clients know how to reach your program and how you will be reaching them, as well as ensuring that any potential clients out in the community know where and how to reach agencies during this time when people may not be on site. And the same thing is true in a lot of ways for communicating with landlords, letting those folks know what you're going to be doing and how particularly as it relates to inspections, getting checks out to them, and all of those kinds of things. That – so, those are important foundations, I think, to put in place as you move into doing business in a different way.

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Just a reminder that these are the Cares Act eligible activities, which I think Kate has already gone through. But these are some of the things that we're going to talk about in a bit more depth to try to tease out what some of the operational ways we'll be putting these things into place. And most of this has

all been pulled from the – from questions that we've received already through the HOPWA AAQ.

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And I will just say, you know, the HOPWA AAQ is staffed by HOPWA TA providers from Collaborative Solutions and from the Cloudburst group. We try very hard to turn those questions around in very short order. But if you have seen delays in getting things back to you, a lot of that has had to do not just with the volume of questions that have come into the AAQ, but also, as you can see from these webinars, the guidance is a rolling kind of thing. And new guidance and answers and issues are coming out as time goes on.

So we do have to kind of back up sometimes and figure out what the question or what the answer to your question is going to be. So just bear with us for that.

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So first, we'd like to take a look at unit inspection requirements, which have been right at the top of the list of questions that have come in through the AAQ and to clarify that unit inspection requirements are different for initial inspections versus the annual re-inspections. The initial unit inspections that are required prior to lease up and move in for TBRA must still be completed.

The waiver provision for HOPWA property standards allows programs to delay what were normally in-person on-site inspections, as long as they're able to conduct those inspections virtually and have policies in place to directly inspect the unit at a later date. On the other hand, annual re-inspections are not required. They're – and those inspections can be temporarily delayed due to COVID-19 health and safety concerns, and we'll talk about that a little bit more.

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So let's review what's required and recommended for initial unit inspections being done remotely. First, grantees must notify their field office to let them know that you will be utilizing the waiver.

Next, you need to put in place some basic policies and procedures on how virtual inspections should be conducted and documented. We recommend that grantees work closely with project sponsors to flesh this out and to make sure everyone is on the same page. Because all of this is very new and everybody needs to be working together to make that happen within the community. And also recommend that you monitor how that process is going to help identify glitches and develop new workarounds, whenever that's needed.

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So what's required for initial unit inspections based on the waiver? The initial inspection requirements are covered in the HOPWA property standards for TBRA provision of the mega-waiver. Most of you, I think, have looked at that information, I'm sure. And you can see that you can – that if you use the waiver to delay on-site - site inspections, which is what it's for, you have to meet two criteria. You must be able to visually inspect the unit through use of technology in a remote manner and have written policies in place to physically re-inspect the unit at a later date.

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Grantees and sponsors have understandably had many questions about how remote inspections could or should work. I know that there will be more guidance and examples coming out soon, but we're providing you here some initial thoughts on that. In terms of methods, these suggestions are listed in order of preference.

Video streaming such as FaceTime would generally give you the most flexibility to have an on-site person walk through the unit and show whatever is needed. Video recordings can also work, especially if the on-site person has good instructions on what to cover. And also date and time-stamped photos could be used when streaming and video technology just is not available.

Some reminders - other reminders include, you know, making sure to cover all areas of the unit. Definitely focus on smoke detectors and use the audio if you're using that, to capture a detector test, and also do visual paint

inspections when that's applicable. And we know there'll be more issues than that and you can work from your checklist to develop those.

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So another common question is, who would be on-site to take the videos or pictures? Just a very good question. And it's going to be different in every case. If you've had staff who were able to be on site, then you wouldn't really need this kind of waiver. So we're trying to work around that.

Programs really may need to be creative in how they make that happen. The videos or other methods that you use could be done by the landlord, by the client, by a client's household member, or others, depending on the situation and the availability of technology. Program staff should let the on-site person know in advance what needs to be recorded, shown, or photographed, then review the results and complete an inspection form for the record.

Some new recommendations include that videos and pictures in many cases should be deleted afterwards and the inspection classified as provisional, since you will need to reinspect on site at a later date. There are a number of thoughts that we got from a program that is doing a statewide TBRA program recently, and they had some examples of what has happened as part of their first experience in doing this. The program was leasing up clients in their own current units, so they were leasing in place, in this case.

So the program staff contacted landlords in advance to talk through the inspections and what would be covered. Landlords took videos in this case in the unit, as directed in advance by the program, going room to room moving through the checklist. An example would be a bathroom needs to have a vent, either a vent or a window. And they had him turn on the vent so it was heard on the video. Same thing with smoke detectors.

The program in this case, got the videos sent to them from the landlord by e-mail, and those were password protected, because there are a lot of issues that come up about privacy around this. Program staff watch the videos and then filled out the inspection forms. They documented and deleted the videos,

which was especially important in that case, since this was a unit that was already occupied by the client.

A few other reminders that came out of that example may seem very common sense, but worth repeating. That if you're using live streaming, make sure that the on-site person's data plan supports that. Reminder about charging batteries in advance, and that some people may need help in learning how to live stream or take a video.

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So, other things on annual inspections. Can grantees and project sponsors postpone annual housing re-inspections due to COVID-19? And I think you saw this during the last webinar, if you were on it that, yes, that can be done. Those inspections may be postponed to be done at a later date when health and safety concerns have passed. However, we want to remind you that progress may choose to continue doing the annual inspections using remote methods. That's not required. But it could be done, especially when there are any concerns about units not being safe. And of course policies should be in place to cover those activities.

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And this is a reminder about things that could be done on an ongoing basis, that even though the annual re-inspections can be delayed, it's still important to be aware of any health and safety issues in client's units as much as you possibly can. And we encourage programs to find ways to check in with their clients about unit conditions.

And that could include anything from actually having them walk through a checklist to checking the smoke detectors, or just making sure that people know that if they have any unit concerns, they could tell you about that or they could send you pictures of it. Just to keep that health and safety issue on the table. Even during these very odd times.

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So, if we are delaying unit re-inspections, can we also delay client re-certifications? Re-certifications kind of got, in a way, put on the back burner while everyone was concerned about the inspections. But that's a very good

question. And the answer is no, that those annual and interim re-certifications should continue, and - even though they will need to be done remotely.

We really expect that many client households will lose income during this time. So it'll be especially important to calculate rent amounts, recalculate the rent amounts when needed. And also a reminder that self-certification of income, which is another waiver provision, can apply to re-certs as well, not just program eligibility, and that grantees must notify their field office when they intend to use that waiver provision.

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There were a lot of questions that came up on the last webinar and in the AAQ about signatures, and whether new procedures could be put in place for required signatures. We do want to remind you that this is really not a HUD requirement - that most requirements for hard, or sometimes called wet signatures are generally local requirements, not regulatory. So the, and this question could also apply to required signatures from any other source not just from clients, but there is quite a bit of latitude that you have in being able to find remote ways to either gain those or to get verbal attestation of signatures for certain documents.

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So self-certification of income and HIV status is another waiver provision. And people have asked, how should we utilize the HIV documentation waiver provision? Do we apply it to all applicants? And really in practice, programs – many programs I think will be able to – will be able to obtain the appropriate source documentation. And so if you can do that, please do it. And continue to do so. Use otherwise what self-certification or information people have, but make sure that you note in records that you are making use of the waiver and the policies - that policies are in place to obtain the source documentation once community restrictions are lifted.

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There have also been some concerns raised about what would happen if afterwards you are unable to get the HIV documentation or find out in – that the client is not HIV positive. HUD really hopes that that's going to be a rare

event but programs should definitely be prepared to handle it. Make sure your documentation is clear, and that if people - people are found not to be eligible for the program due to their HIV status, they will need to be terminated and also directed to other non-HIV specific program resources in the community. So, again, documentation will be important.

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In the last webinar, we noted that the \$1,200 stimulus checks that most clients will be receiving would not be counted as income. And so we're clarifying this time that both those \$1,200 stimulus checks and the temporary \$600 a week federal enhancement to unemployment checks are both considered as temporary non-recurring or sporadic income, and should be excluded as income when determining income eligibility and rent calculations for the HOPWA program. As a reminder, other regular unemployment payments that are issued by the state are treated as income as usual for the program.

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So another waiver is the FMR rent standard waiver. And people have asked what is allowed under that. It means that grantees can increase the rent standard in order to find appropriate units more quickly. But all units, even if you go above the rent standard, above FMR, if that's the rent standard you're using, but all units have to be shown to be rent reasonable.

It is an additional flexibility that you could have to quickly house people. But there are a lot of questions I think that will need to be answered about that in the future. One of the questions that has come up is when would that raised FMR or rent standard end? Would it- it's allowed for a year. There will be more guidance on this in the future, but the most likely action will be that programs will be able to allow movement back to the current rent standard at the end of a person's lease, not at the end of that one year. There are a lot more nuances to how programs will revert to the current rent standard so for - look for future guidance on that, and more information.

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Some grantees have also asked whether the rent standard waiver can be used for master leasing programs. This waiver only applies to TBRA programs.

But we will say this is another thing you should stay tuned for. Additional waiver options are being assessed right now at HUD that could address that issue.

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This is guidance on the use of hotels/motels that was provided during the last webinar. It specifically outlines the ways in which hotels or other locations may be used for quarantine and isolation purposes. Also note that the normal limit of 60 days in a six-month period for hotel/motel vouchers can be extended due to health and safety concerns related to COVID-19. And grantees can put policies in place or really must put policies in place regarding those hotel/motel stays that detail the time limits that they are putting in place, as well as the process for granting extensions based on documented household health and safety concerns.

This guidance, which does not require a waiver gives programs a lot more flexibility in the use of hotel motel rooms, which can be used for isolation purposes for non-HIV positive family members if they need to be living separately for a while, and can be for longer periods of time or just because that is the only place that's available to them right now.

There is some language in there that leaves it fairly vague about hotels/motels or other options. We've had some questions about whether people could use Airbnb units or other types of temporary housing if hotels and motels are not available, and I think the door is open for that. That would just be a matter of, you know, reviewing what's available and what the cost is, the relative cost is and so forth based on, you know, what's available in your community.

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This is a reminder that hotel/motel vouchers can only be provided through facility based housing, the leasing line item. So if a grantee has not provided funding for hotel/motel vouchers in the past, they will need to amend their Con Plan to do so. We'll address another way that you might be able to start providing this type of housing prior to the Con Plan amendment in just a few minutes in the presentation.

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Another question is we've been – we're already providing hotel/motel rooms now to help clients and household members isolate. Can these costs be reimbursed later from the new CARES Act award? And the answer to that is yes, that you should be able to reimburse yourself for those costs when the CARE Act funds are received in the community, and there'll be more guidance on that as well.

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Lots of hotel/motel funding questions. So also, we would like to be able to provide for hotel/motel space, but we see STRMU is a greater need in our community. Are there other resources we can use to access hotels and motels?

So I think grantees are going to have to make some tough decisions about where to best direct CARES Act funding, as Kate was talking about in the beginning. This provides a reminder that hotel and motel stays are also being covered through other programs, including Ryan White, ESG, and even FEMA. So finding out how you can access hotel stays for your clients through other programs may be very helpful to you in deciding how much funding to put toward this type of housing versus STRMU or other types of activities.

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Lots of people have been asking about STRMU extensions and going beyond the 21-week limit. Right now, we want to remind people that this – that STRMU assistance can only be extended beyond 21 weeks using CARES Act funding, not your regular HOPWA grant funding. However, you are allowed to start doing those extensions before receiving the CARES Act funding, and then you'll be able to move or reimburse those costs when you receive the CARES Act funding. And HUD has told us that there'll be more guidance coming on tracking STRMU and those kinds of policies because I know it is – it seems like a very confusing thing to keep track of your regular STRMU versus what's being done under the CARES Act.

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This new guidance on transportation services as well as what we're going to talk about related to nutrition should be of particular interest. This is – is something new. In the past, gas cards could only be used if the grantees obtained the specific waiver from HUD, but this is now being allowed during the COVID-19 response. So you can provide transportation services in a more flexible way that - that could take the form of gas cards or similar prepaid debit cards.

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Just very similar to the new guidance coming out about nutrition services. We hear from many grantees that helping clients get food and meals is a major concern. In the current world, the use of food banks or periodic provision of nutrition services may not be enough. So programs are being given a lot more flexibility in the ways that you can help with food, based on local circumstances and needs. So this could include the use of grocery store cards, also something that - that has not been usually approved in the past, given to clients to purchase groceries or have them delivered.

We've heard from a number of grantees about ways that they're starting to look at this in very large communities that have in one case, you know, more than 800 people on TBRA, most of whom are very – considered very vulnerable households. They – this city had such staff limitations during – and of course dealing with community shutdowns that made it unrealistic to be able to deliver food to all of these households.

So they are in their case, using grocery debit cards to be able to do that and to assure that people are being able to get the food and the groceries that they need. In other communities, it may be easier to be able to deliver things in a slightly more personal way with programs ramping up their food programs to provide weekly drive-thru pickup of groceries for clients and similar things. So you will have some leeway in how you go about that.

SLIDE 51

Protective supplies. We've had questions like this about whether HOPWA funds can be used to purchase protective supplies such as mask, hand

sanitizers, sterilizing wipes and so forth for clients in our program, and whether that could be done under supportive services.

We would say, yes, the CARES Act funding in particular can be used for those costs related to infection control measures, and it can be done for assisted households. That's something that you could be – that you could charge to supportive services. And if – we just want to say a couple of things: one is make sure that you look first at what Ryan White is providing through their program before you use HOPWA funds for this, because that's certainly one of their services and priorities as well. ESG, same thing. So take a look at that.

And if you are going to provide it through your HOPWA program, we recommend that you have some policies in place that will help you, you know, document that no alternate sources were available, explain what kind of supplies are needed by clients in your area, and describe who could receive those supplies and in what quantity. Because those are decisions you're going to have to make when you - when you start providing things like that. And making sure that people are all treated equally in their access to these kinds of protective supplies.

I know that's on a lot of people's minds right now.

SLIDE 52

Laptop software, cell phones we talked about this last time as well. These are things that do not need any kind of waiver to be purchased, but grantees can allow this - items that are needed in particular to increase communication, remote communication with clients, are things that can be purchased, and those costs can be spread across the different program activities based on a prorated share of the amount of time that they're used in each activity, whether Supportive Services, TBRA, Permanent Housing Placement and so forth. And competitive grantees would have to – would be required to do a budget or contract amendment to add those as approved costs.

SLIDE 53

So this is – we could qualify this as late breaking news. So, cell phones, we have been asked whether HOPWA will allow purchase of cell phones and wireless service plans for clients to use when receiving supportive services. This is something that is just now being done on the CoC side. So, while we don't have anything final, any kind of final language on it, the indication that we have gotten is that purchase of cell phones and wireless plans for clients, when that's really needed to facilitate ongoing case management, could be allowed as a supportive service expense.

There would – that would come with other requirements, such as the cell phone would actually be owned by the project sponsor, and the wireless service plan would be in the sponsor's name, but the phone would be loaned to program participants as needed to enable that provision of supportive services or to help them in obtaining and retaining housing. It may be also possible for sponsors to purchase phones for their TBRA programs and charge to TBRA, that could be temporarily loaned to clients or to landlords, when needed to do virtual inspections. We've certainly heard – had some input from people saying not all clients or households, or landlords have smartphones to be able to do the kind of recording we would need to do. So stay tuned on that some of the more specific guidance is on the way.

And the last question, we have – has to do with whether CARES Act funds can be used to reimburse. So, the question really is if CARES Act funds can be used to reimburse allowable costs, how can we fund those activities now, right now, in order to deliver needed housing and services? In other words, you have to have some place to initially charge the activity to. And we know that you'll be able to get payments reimbursed later when your CARES Act funding is in place, but where?

So, OHH is suggesting this as a workaround, that formula and competitive grantees could use a couple of methods to be able to do this. The first is, you could charge those activities and it could be hotel/motel vouchers or things like that to, and especially if you don't have that in your plan, charge it to general funds or other non-HOPWA resources to pay for those activities. Or, also, you should be able to charge to...

Rita Harcrow: Crystal.

Crystal Pope: Yes.

Rita Harcrow: I think you might need to advance the slide. I don't know if it's just mine that's...

Crystal Pope: Oh, I am sorry. I'm so sorry.

Rita Harcrow: No, it's OK.

SLIDE 54

Crystal Pope: Yes. Would you like to talk about this one, Rita?

Rita Harcrow: I think you are doing a good job with it.

Crystal Pope: OK. So I apologize. OK. So...

Rita Harcrow: No, that's...

Crystal Pope: Yes.

Rita Harcrow: You're doing great.

Crystal Pope: So we're – right. And so we're looking at this as - as a workaround that people could also charge to your current HOPWA award. And even if you don't have that as a line item, you can choose another line item that you have to temporarily charge this activity to.

It is, you know, you must have clear documentation to do that so that you can track it and come back and charge those costs later to the CARES Act funds when you receive them. So just to be clear, all we're saying here is that the non-CARES Act grant would – or source, would be used to front the money, in a way, with the expectation and proof that a re-vouchering or reconciliation to the CARES Act funds would take place at a later date.

All of that would have to be reconciled. And I know this is – this will probably spawn a lot of other questions. We will be glad to look into it further and answer your questions. Please put your questions into the AAQ on that. If we have questions that are queuing up right now, we will try to answer those, especially since we have OHH on the line – or, on this webinar.

So, I think we have – that covers all of the specific questions that we wanted to talk about today. Christine and Emily, I just wanted to see where we are with questions that have come in.

Christine Campbell: Yes. So we've got a few categories but I think we could use some clarification on. One is STRMU. Can you use STRMU funding from the CARES Act on top of other subsidies like TBRA?

Rita Harcrow: I'm not sure I understand how that would work. So are we saying a person or a household assisted with TBRA assistance would also need a household member to get STRMU or utility assistance, I'm not really sure.

Christine Campbell: Right. They would need – they might need utility assistance, they may not be able to pay their portion of the rent. So they're – so wanting to see if they could then use STRMU on top of some of those other HUD subsidies, be it like TBRA.

Rita Harcrow: So, I know other folks at OHH will want to chime in. But the first thing I would recommend there is that you recalculate the client portion of the rent. So if they've lost their employment or are substantially getting less money, then it's time to recalculate that, because the TBRA amount may go up, and it may go up to the amount that includes all the rent and utilities when you redo that. I don't know of any other situations where STRMU might come into play, but I - I'll defer to other folks if they have any ideas on that.

Ben Ayers: Yes, no, Rita, this is Ben. I think you're exactly correct with what's kind of been discussed and worked out, that it's the recalculation that would need to be done because that is inclusive of a utility allowance. And...

Rita Harcrow: So I guess...is that person...

Ben Ayers: That looks like that where we said kind of like they should double up on assistance is like if the TBRA household, or even a STRMU household needs part, you know, some of those households need to be, you know, quarantined or put in a hotel/motel or Airbnb to separate them out that both of those things could be paid for at the same time in that situation.

Christine Campbell: Can STRMU be used to pay back rent?

Crystal Pope: So, that has always been – oh I'm sorry.

Rita Harcrow: No, go ahead.

Crystal Pope: Oh, I just want to say that, that has always been possible to use STRMU to pay for back rent. So in talking – and in talking through some of this, I'm not sure exactly what the question is. But when, you know, if you're helping people after things are kind of coming back to normal or when landlords start to evict people and maybe people that we hadn't served before and they owe back rent, certainly STRMU is something that could be used for that.

Christine Campbell: Yes, it sounds like people are wanting to use STRMU to prevent homelessness, understandably so, but that they have – that they're already in the system receiving a subsidy of some sort. So really clarifying how STRMU can be used in conjunction, and I think you've answered that in terms of recalculating rent, using it as you see as its intended use, so – but it – that just seems to be popping up amongst several of our questioners. Emily?

Emily Fischbein: Yes. Changing gears a little bit, Crystal and Kate, we have a question about the Action Plan, a specific question about the Action Plan and how should the CARES Act funding be accounted for in the amendment. I think the question is specifically about the Resources section, and should the additional funding go in the box marked “Other” or should it be added to the HOPWA box?

Ben Ayers: We have additional guidance on that that we're working on that we will be putting out. We're still working through some of those issues around whether or not it will be required to update that - the Resources section.

Emily Fischbein: So should grantees wait on that until the guidance?

Ben Ayers: Yes, we have a noticing clearance and we have guidance coming. And so it, you know, it'll be a while once that notice is out and once that guidance is out, and once the money is out there. You know, they'll have to, you know, do those things, execute the grant agreement and then start setting up IDIS and that guidance will be, you know, solidified before that point.

Emily Fischbein: OK, thank you. Christine?

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Christine Campbell: We've had several questions around how to protect our households from eviction. So if a landlord sends notice of eviction for nonpayment of rent, how do we protect them? What kind of communications should we share? Should we engage Legal Aid?

Rita Harcrow: So one thing - I'll go back to what was said earlier about, if a household is assisted by HOPWA and they're getting an eviction notice for nonpayment, then it makes sense to recalculate that rent and figure out what's happening with the - the client's portion. I'm not sure what other circumstance would be happening there, where the HOPWA portion couldn't just increase to cover the rent so that the household should not get into a situation of being in arrears. But if the client is receiving an eviction notice, I hope that everybody already has policies in place of how you work with landlords and intervene on behalf of your clients, and provide the case management and stability planning to avoid eviction.

Christine Campbell: Thank you. Em?

Emily Fischbein: OK, thanks. We have a question here about Ryan White funds and HOPWA funds. And the question is, do you have to use Ryan White funds first if the HOPWA client is also eligible for Ryan White before using the new CARES Act funds?

Rita Harcrow: So that is a great question. And as you probably know, a lot of resources are coming online at the same time right now, and we have started having conversations with Ryan White folks on what's eligible for HOPWA and Ryan

White programs and just as you're doing, they are looking at what the needs are in their communities. So, you know, it's time to have those conversations at the local level, even though that's particularly challenging right now. As much as you can coordinate and avoid duplication - that's what would be most beneficial. But as far as some of the prior payer of last resort information for the CARES Act funding, you know, that would not be a requirement for things like personal protective equipment or sanitizing supplies and so on that might have been considered medical.

Christine Campbell: And I think we just have time for about – I think we have time for just one more. There's been several questions of, around competitive grantees. If they would want to add service categories like STRMU or PHP, how could they go about doing that?

Rita Harcrow: So could you – could you repeat that? Are you talking about – so their current award doesn't have PHP and...

Christine Campbell: They are competitive grant, it looks like, that they are a competitive grantee and they would like to add STRMU – I'm trying to pull up the question right in front of me. STRMU and/or PHP, is that allowable?

(Crosstalk)

Rita Harcrow: Right, so I think – right, go ahead.

Ben Ayers: Go ahead, Rita.

Rita Harcrow: Well I think that was the last slide before the “Stay Informed” slide that covered, you know, getting assistance out quickly. So for a competitive grantee if, you know, your CARES Act funds when they arrive will not have to be lined up the way that you have your budget line items now for your permanent supportive housing grant. So it's – in order to get funds out quickly, you could use whatever line item you have funds available in now with the intention of having the appropriate STRMU or PHP line item in your CARES Act award, and reconciling that when it – when the funds are available to do that.

Just make sure that you're documenting everything clearly and that's how you intend to carry out the CARES Act activity. And the whole point of that is just, we're trying to brainstorm and find ways to get funds available now, today, so that you could go ahead and provide services today and not wait on all of this to be set up.

Christine Campbell: So just to be clear, if you are...

Ben Ayers: You would have to – whatever you're vouchering to your current rent, you absolutely would have to re-voucher to your CARES money when you gain access to that funding and have that all set up in the IDIS. You would not be able to keep those costs under your current grant.

Christine Campbell: So just to be clear, if you're a competitive grant, and you do not currently have, say, STRMU as part of your activities, and since you don't have a Con Plan, can you start providing those services? Or is there any kind of amendment that needs to be done to your competitive grant agreement?

Ben Ayers : No amendment to your competitive grant agreement. I think what we've worked out is you just have to meticulously track how you are getting that money for COVID response. And then when you get your CARES Act money, you're going to have to show that you've re-vouchered those expenses to the CARE Act money.

Christine Campbell: OK. Thank you.

Amy Palilonis: And then before signing – before signing a grant agreement for that CARES Act money, competitive grantees will be providing a description of the activities that they are - they are funding- for COVID-19 response, as well as a HUD 4110-B with this – related to this COVID-19 funding. Correct, Ben?

Ben Ayers: Yes. So you'll want to make sure whatever you're spending money on, you have identified those line items under your CARE Act money that you intend to use it for.

Christine Campbell: Great. Thanks so much. I'm going to turn it back over to Kate to go through resources.

Kate Briddell: Great. Thanks, Christine, and thanks for all those great questions. And also, thanks to all of you for still hanging with us. I know we are beyond a little bit from our scheduled time, but we wanted to make sure that we were able to give you some additional guidance. So as you know the guidance is coming out quickly. So the best way to stay informed is to subscribe to the HOPWA mailing list. You can also find COVID guidance for HOPWA grantees on the HOPWA COVID landing page including recordings and transcripts from the last two webinars. This one should be posted there within the week.

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We also wanted to remind you of the resources that are available to you. As mentioned before, the COVID landing page on the HUD exchange, the text from the memorandum waiver, the list of CPD directors' e-mails in order to exercise those waivers. Here is a link to the supplemental award amount that I had mentioned previously. And then of course, the AAQ. So if you have additional questions that didn't get answered today, please put those into the Ask A Question Help Desk.

Some non-HOPWA related resources that we think would be important for you to be aware of is this Disease Risk and Homelessness webpage on the HUD exchange, the HHS Interim Guidance for COVID-19 and Persons Living with HIV. The HIV.gov web page on Coronavirus, and then the Novel Coronavirus Frequently Asked Questions for Ryan White AIDS Program.

SLIDE 57

And then finally, technical assistance. So grantees in need of technical assistance related to COVID-19 should submit a TA request via the request program assistance webpage on the HUD Exchange portal.

SLIDE 58

Well, that is all we have time for today. We have collected the questions that have been submitted during the chat box that we weren't able to get to. Again, ask your questions through the Ask A Question Help Desk if you weren't able to submit them today. And we want to thank you for joining us today. So with that, I'm going to say goodbye and stay healthy.

Valencia Moss: A copy of today's presentation will be made - will be made available immediately after today's webinar. You will receive an e-mail for everyone who's registered with a link on how to access today's recording and also how to access a copy of today's webinar slides. We thank you for your participation. Have a great afternoon. Bye-bye.

Operator: The leader has disconnected. The conference will be terminated in...

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